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August 27, 2019

54765-1

Via ECF

Honorable Kathryn C. Ferguson
United States Bankruptcy Court
402 East State Street
Trenton, New Jersey 08608

Re: Andrea E. Rapach
Chapter 13
Case No. 19-16816 (KCF)

Dear Judge Ferguson:

This firm represents creditors Martin & Tune, LLC and Friedman, LLP (collectively, the “Creditors”), two creditors in the above referenced matter. Debtor’s confirmation hearing was originally scheduled for June 12, 2019. On June 11, 2019, the Creditors filed a Letter Objection (Doc. 19) to Debtor’s Chapter 13 Plan (Doc. 2). On June 12, 2019, Debtor’s counsel indicated that the Plan would be modified and that the Debtor intended to pay creditors in full. The Debtor’s modified plan was supposed to be filed by July 15, 2019 and confirmation hearing is scheduled for tomorrow, August 28, 2019.

The Debtor has failed to file a Modified Plan. My colleague, Ms. Placona, has emailed and called Debtor’s counsel for a status update on the case but she has not heard back from counsel. Based on the Debtor’s failure to file a Modified Plan and the Creditors continued Letter Objection, the Creditors object to confirmation of the Plan and do not intend to appear in court tomorrow.

Accordingly, the Creditors object to confirmation of the Plan.

Thank you for the Court’s attention to this matter.

Respectfully,

/s/ Anthony Sodono, III

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